

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :	:	CRIMINAL NO.
v.	:	DATE FILED: November 20, 2003
RICHARD A. ROYSTER, and	:	VIOLATIONS:
HASSAN KENNEDY	:	18 U.S.C. § 371 (Conspiracy to pass
	:	counterfeit currency - 1 count)
	:	18 U.S.C. § 471 (Making counterfeit
	:	United States currency - 1 count)
	:	26 U.S.C. § 5861(i) (Possession of a silencer
	:	without a serial number - 1 count)

I N F O R M A T I O N

COUNT ONE

(Conspiracy to pass counterfeit money – 18 U.S.C. § 371)

THE UNITED STATES ATTORNEY CHARGES:

At all times material to this indictment:

1. Defendant RICHARD A. ROYSTER lived on the second floor of a row house at 752 Hicks Street in Philadelphia.
2. Defendant RICHARD A. ROYSTER possessed a computer, a printer, trays and chemicals for bleaching genuine United States currency, and computer digital images of United States one hundred-dollar federal reserve notes for printing on the paper of bleached United States currency.
3. From in or about July, 2003 to on or about September 18, 2003, at Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendants

RICHARD A. ROYSTER and
HASSAN KENNEDY

conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is, with intent to defraud, to pass, utter and publish falsely made, forged and counterfeited obligations of the United States, that is, counterfeit one hundred-dollar United States federal reserve notes, in violation of Title 18, United States Code, Section 472.

MANNER AND MEANS

4. It was part of the conspiracy that defendant RICHARD A. ROYSTER used chemicals and trays to bleach the ink off of genuine five-dollar United States federal reserve notes.

It was further a part of the conspiracy that:

5. Defendant RICHARD A. ROYSTER used a computer, digital images of United States one hundred-dollar federal reserve notes, and a color printer attached to that computer to print counterfeit one hundred-dollar bills on the bleached five-dollar bills.

6. Defendant RICHARD A. ROYSTER gave these counterfeit one hundred-dollar bills to individuals known and unknown to the grand jury, including defendant HASSAN KENNEDY, to take to businesses to pass as genuine currency at those businesses. They did this to make small purchases for the purpose of obtaining change in genuine United States currency.

7. Defendant RICHARD A. ROYSTER required the individuals who took this counterfeit currency to businesses, passed the counterfeit notes, and obtained genuine United States currency as change, to give back to him a portion of the genuine currency they received from passing the counterfeit one hundred-dollar bills.

8. Defendant RICHARD A. ROYSTER printed and had individuals, including defendant HASSAN KENNEDY, pass approximately \$6,000 worth of counterfeit one hundred-dollar United States federal reserve notes.

OVERT ACTS

In furtherance of the conspiracy, defendants RICHARD A. ROYSTER and HASSAN KENNEDY, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. In or about mid-July, 2003, defendant RICHARD A. ROYSTER gave counterfeit one hundred-dollar United States federal reserve notes to defendant HASSAN KENNEDY.
2. In or about mid-July, 2003, defendant HASSAN KENNEDY passed counterfeit one hundred-dollar United States federal reserve notes to unsuspecting victim businesses, received change in genuine United States currency from these businesses, and gave part of the change received to defendant RICHARD A. ROYSTER.
3. On or about September 15, 2003, defendant RICHARD A. ROYSTER bleached genuine five-dollar bills, printed counterfeit one-hundred dollar bills on the paper, and gave the counterfeit one hundred-dollar United States federal reserve notes to defendant HASSAN KENNEDY.
4. On or about September 18, 2003, defendant RICHARD A. ROYSTER began printing more counterfeit one hundred-dollar United States federal reserve notes.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO
(Counterfeiting – 18 U.S.C. § 471)

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about September 15, 2003, at Philadelphia, in the Eastern District of Pennsylvania,
defendant

RICHARD A. ROYSTER

with intent to defraud, falsely made, forged and counterfeited obligations and securities of the United States, that is, approximately \$1,100 in counterfeit one hundred-dollar United States federal reserve notes.

In violation of Title 18, United States Code, Section 471.

COUNT THREE

(Possession of a Silencer Without Serial Number – 26 U.S.C. § 5861(i))

THE UNITED STATES ATTORNEY FURTHER CHARGES:

On or about September 18, 2003, at Philadelphia, in the Eastern District of Pennsylvania,
defendant

RICHARD A. ROYSTER

knowingly possessed a firearm, that is, a silencer as defined in section 921 of Title 18, United States Code, which firearm was not then identified by a serial number as required by Chapter 53 of Title 26, United States Code.

In violation of Title 26, United States Code, Sections 5842, 5845(a), 5861(i) and 5871.

PATRICK L. MEEHAN
United States Attorney